REMARKS

Claims 1-23 are pending in the application.

To date, no Notice of Draftsperson's Patent Drawing Review has been received. Applicant respectfully requests receipt of this document when it becomes available. Applicant requests the acknowledgement of the Letter to Official Draftsperson mailed on December 12, 2002 (filed on December 17, 2002).

35 U.S.C. § 103(a) Rejection

Claims 1-23 presently stand rejected under 35 U.S.C. § 103(a) over Shinotsuka (U.S. Patent No. 6,191,408 B1) in view of Dhuse (U.S. Patent No. 6,133,862). Because the proposed combination of Shinotsuka and Dhuse fails to disclose or suggest all of the limitations of claims 1-23, it is respectfully submitted that claims 1-23 patentably distinguish over the proposed combination.

It is noted that the present Office Action, under the heading "Response to Amendment", mentions that the present claims fail to recite "a RAM, a ROM or the like, a comparator, and a calculation device" (Office Action, p. 2, l. 6-9), referring to a statement made in the previous Amendment that "both Shinotsuka and Dhuse fail to teach a pixel that includes a ROM, a RAM with an input from a keyboard or the like, a comparator, and a calculation device" (Amendment filed June 9, 2003, p. 7, l. 19-20) In response, it is respectfully pointed out that the referenced statement from the previous Amendment is not an assertion that the claims recite "a RAM, a ROM or the like, a comparator, and a calculation device." Rather, this statement, taken within the context in which it was presented, speaks to the inadequacy of the cited references to lead one skilled in the art to combine them as suggested in the present rejection.

Specifically, the present rejection alleges that "[i]t would have been obvious to one of ordinary skill in the art at the time that the invention was made to provide the correction

circuitry 6 of Shinotsuka *in the form of a pixel*" (Office Action, p. 3, l. 20-22, emphasis added). However, the present rejection provides no evidence to support such an allegation. That is, there is no evidence that one skilled in the art would even consider consolidating the extensive circuitry involved in the correction circuitry 6 of Shinotsuke into a pixel. Instead, this allegation seems to be based solely on the mere existence of a reference pixel in the prior art. As pointed out in the previous Amendment:

> [B]oth Shinotsuka and Dhuse fail to teach a pixel that includes a ROM, a RAM with an input from a keyboard or the like, a comparator, and a calculation device **so as to make the proposed combination obvious to one of ordinary skill in the art at the time of the present invention** (emphasis added).

(Amendment filed June 9, 2003, p. 7, l. 19-22). In other words, the present rejection alleges that the circuitry 6 of Shinotsuka, which includes a ROM, a RAM, and so forth, can obviously be provided in a pixel, merely because Dhuse discloses a reference pixel. Yet, there is no evidence to suggest that one skilled in the art would, indeed, find such a modification obvious, and furthermore there is no evidence to suggest that one skilled in the art would have considered there to be any reasonable chance of such complex circuitry (i.e., including a ROM, a RAM, etc.) as that included in the circuitry 6 of Shinotsuka being successfully provided in the form of a pixel.

As set forth in MPEP 2142, "[t]he examiner bears the initial burden of factually supporting any *prima facie* conclusion of obviousness." The present rejection lacks adequate factual support for establishing a *prima facie* case of obviousness. That is, there is no factual support for the allegation that one of ordinary skill in the art would have considered it obvious, or even possible, to provide the correction circuitry 6 of Shinotsuka in the form of a pixel at the time the invention was made. Therefore, since the present rejection fails to establish a *prima facie* case of obviousness, it is respectfully requested that the present rejection of claims 1-23 under 35 U.S.C. § 103(a) over Shinotsuka in view of Dhuse be reconsidered and withdrawn.

Incidentally, if the Examiner is intending to indicate that he is relying on facts within his personal knowledge, he is respectfully requested to provide support for such knowledge by citing an appropriate reference and/or providing an affidavit in accordance with 37 C.F.R. § 1.104(d)(2).

CONCLUSION

In view of the foregoing remarks, this application is considered to be in condition for allowance, and an early reconsideration and a Notice of Allowance are earnestly solicited.

If an extension of time is required to enable this document to be timely filed and there is no separate Petition for Extension of Time filed herewith, this document is to be construed as also constituting a Petition for Extension of Time Under 37 C.F.R. § 1.136(a) for a period of time sufficient to enable this document to be timely filed.

Any fee required for such Petition for Extension of Time, and any other fee required by this document, other than the issue fee, and not submitted herewith, should be charged to Sidley Austin Brown & Wood LLP's Deposit Account No. 18-1260. Any refund should be credited to the same account.

Respectfully submitted,

By: 

Brian E. Harris
Registration No. 48,383
Agent for Applicant

BEH/llb:jkk:bar
SIDLEY AUSTIN BROWN & WOOD LLP
717 N. Harwood, Suite 3400
Dallas, Texas 75201
Direct: (214) 981-3461
Main: (214) 981-3300
Facsimile: (214) 981-3400
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